

174921 SA

COLUMBIA CHARLESTON FLORENCE GREENVILLE

Haynsworth
Sinkler Boyd, PA.

ATTORNEYS AND COUNSELORS AT LAW

1201 MAIN STREET, 22ND FLOOR (29201-3226)
POST OFFICE BOX 11889 (29211-1889)
COLUMBIA, SOUTH CAROLINA
TELEPHONE 803.779.3080
FACSIMILE 803.765.1243
WEBSITE www.hsblawfirm.com

AMELIA MCKIE
DIRECT DIAL NUMBER 803.540.7866
EMAIL amckie@hsblawfirm.com

July 22, 2005

VIA HAND DELIVERY

Mr. Charles L. A. Terreni
Chief Clerk and Administrator
Public Service Commission of South Carolina
100 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Docket No.: 2005-191-E


Dear Mr. Terreni:

Please find enclosed for filing an original and ten (10) copies the *Petition to Intervene*, being filed on behalf of South Carolina Electric & Gas Company, in the above-referenced matter.

Please be kind enough to date-stamp the extra copies of the *Petition to Intervene* and return to this office via the bearer of this letter.

Thanking you for your attention hereto, I am,

Sincerely,


Amelia B. McKie
Assistant to Belton T. Zeigler

enclosures

cc: Len S. Anthony, Esquire
Kendal Bowman, Esquire
Richard L. Whitt, Esquire
C. Dukes Scott, Esquire

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-191-E

SO. CAROLINA
PUBLIC SERVICE
COMMISSION
2005 APR 22 PM 3:15
FILED

IN RE: Docket No: 2005-191-E-Generic)
Proceeding to Explore a Formal Request)
For Proposal Process For Utilities That) **PETITION TO INTERVENE**
Are Considering Alternatives For Adding)
Generating Capacity)

South Carolina Electric & Gas Company (SCE&G), pursuant to Public Service Commission of South Carolina ("Commission") Rules 103-830, 103-836, *inter alia*, hereby petitions this Commission for an Order allowing it to intervene as a Party of Record and participate in the above described docket.

In support of its petition, SCE&G would show the following:

1. SCE&G is an electric utility headquartered in Columbia, South Carolina that generates, transmits, distributes, and sells electric power to the public in its service territory in South Carolina, subject to the jurisdiction of this Commission.
2. Attorneys authorized to receive communications and pleadings relevant to this Petition are:

Patricia B. Morrison
SCE&G
1426 Main Street
Legal Dept., Mail Code 130
Columbia, South Carolina 29201
(803) 217-7880

Belton T. Zeigler
Haynsworth Sinkler Boyd, P.A.
Post Office Box 11889
Columbia, South Carolina 29211
(803) 540-7815

3. Order No: 2005-2, issued in Docket No: 2004-178-E, dated, January 6, 2005 called for, *inter alia*, a generic docket gathering information concerning South Carolina utilities'

procedures for adding generating capacity. Thereafter, Docket 2005-191-E was opened.

On July 12, 2005 a notice was issued relevant to that Docket, requiring intervention by August 15, 2005.

4. SCE&G was a party to Docket No. 2004-178-E and has substantial and material interests related to the present Docket and therefore should be allowed to intervene and participate fully in the Docket and the hearing of this matter.

WHEREFORE, SCE&G requests that:

This Commission inquire into this matter and issue and issue an Order that:

- 1) Grants SCE&G's request to be allowed to intervene in this matter and participate fully in the Docket and the hearing to be held on October 26, 2005;
- 2) Grants SCE&G all rights attendant to intervenor status; and
- 3) Grants such other and further relief as this Commission may deem just and proper.

Respectfully submitted,



Patricia B. Morrison
SCE&G
1426 Main Street
Legal Dept., Mail Code 130
Columbia, South Carolina 29201
(803) 217-7880



Belton T. Zeigler
Haynsworth Sinkler Boyd, P.A.
Post Office Box 11889
Columbia, South Carolina 29211
(803) 540-7815

ATTORNEYS FOR SOUTH CAROLINA ELECTRIC
AND GAS COMPANY.

Columbia, South Carolina
Dated: July 22, 2005.

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-191-E

2005 JUL 22 PM 4:15
RECEIVED
PUBLIC SERVICE COMMISSION

IN RE: Docket No: 2005-191-E-Generic)
Proceeding to Explore a Formal Request)
For Proposal Process For Utilities That)
Are Considering Alternatives For Adding)
Generating Capacity)


CERTIFICATE OF SERVICE

I, Amelia McKie, the undersigned employee of Haynsworth Sinkler Boyd, P.A., hereby certify that I have this 22nd day of July, 2005, caused copies of the *Petition to Intervene*, being filed on behalf of South Carolina Electric & Gas Company, in the above-referenced docket, to be served on the parties of record, whose names appear below, via First Class, United State Mail, unless otherwise indicated:

Len S. Anthony, Esquire
Kendal Bowman, Esquire
Carolina Power and Light Company d/b/a Progress Energy Carolinas, Inc.
Post Office Box 1551
Raleigh, North Carolina 27602

Richard L. Whitt, Esquire
Duke Power, a division of Duke Energy Corporation
Austin Lewis & Rogers, P.A.
Post Office Box 11716
Columbia, South Carolina 29211

C. Dukes Scott, Esquire
Executive Director
Office of Regulatory Staff
Post Office Box 11263
Columbia, South Carolina 29211


Amelia B. McKie

Columbia, South Carolina
July 22, 2005.